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November 12, 2021

## **VIA ECF**

Honorable Lorna G. Schofield United States District Court Judge Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Contant, et al. v. Bank of America Corp., et al., No. 17-cv-3139

Dear Judge Schofield,

Pursuant to Your Honor's Orders of October 18, 2021 [ECF 501] and October 25, 2021 [ECF 509], counsel to claimant AMA Capital Management, LLC ("AMA") in the above-captioned matter respectfully submit this letter motion requesting permission to file under seal portions of its Supplemental Brief and the entirety of Exhibits 10-13 that contain highly confidential and propriety business information regarding AMA's trades, trading partners, business strategies, and agreements. Consistent with Your Honor's Individual Rules, counsel will file the unredacted version of the Supplemental Brief with the proposed redactions as highlights under seal along with the fully sealed versions of the exhibits. Thereafter, counsel will file a redacted version of the Supplemental Brief and placeholders for the sealed exhibits on the record. Attached to this letter is an appendix that identifies the parties and attorneys of record who should have access to the sealed version of the Supplemental Brief and exhibits.

We thank Your Honor for its time and attention to this matter.

Respectfully submitted,

Damian R. Cavaleri

LORNA G. SCHOFIELD

United States District Judge

Application GRANTED for the reasons identified in the Order at Dkt. No. 501.

The Clerk of Court is respectfully directed to (1) maintain the letter at Dkt. No. 526 under seal with access limited to the parties and attorneys identified in the appendix to this letter and (2) close the motion at Dkt. No. 524.

Dated: November 16, 2021 New York, New York



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## **APPENDIX**

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